

EXHIBIT 8

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14 UNITED STATES DISTRICT COURT FOR THE
15 CENTRAL DISTRICT OF CALIFORNIA
16 (Western Division-Los Angeles)

17 KEVIN SO,

18 Plaintiff,

20 v.

21 LAND BASE, LLC, et al.

22 Defendants.

CASE NO. CV 08-3336 DDP (AGR_x)

DECLARATION OF BIRUI WANG
PLAINTIFF'S MEMORANDUM OF
POINTS AND AUTHORITIES IN
OPPOSITION TO DEFENDANTS
KEVIN KONDAS, MIRA MELTZER,
KM & ASSOCIATES
INTERNATIONAL, LLC, AND CTL
PROJECTS INTERNATIONAL, LLC
MOTION FOR SUMMARY
JUDGMENT

1 I, BIRUI WANG, pursuant to 28 U.S.C., Section 1746, being duly sworn,
2 depose and say:

- 3 1. I am a resident of Ontario, Canada. My home address is 28 Leeswood Cresnet,
4 Scarborough, Ontario, Canada, M1S 2P3. I am over the age of 18 and
5 competent to make this declaration. I have personal knowledge of the facts set
6 forth herein, except as to those matters set forth as based on information and
7 belief, and as to those matters I believe them to be true.
- 8 2. I am providing this declaration in support of Kevin So's Opposition to
9 Defendants KM & Associates International, LLC, CTL Projects International,
10 LLC, KB&M Projects International, LLC, Mira Meltzer and Kevin Kondas'
11 ("Moving Defendants") Motion for Summary Judgment ("Opposition").
- 12 3. This case concerns a fraud known as the Private Placement Project that was
13 perpetrated by Canadian citizens Lucy Yan Lu ("Lu") and Henry Yang
14 ("Yang") and various co-conspirators, including the Moving Defendants, against
15 Mr. Kevin So and myself. I owned 40% of the funds that were deposited into
16 the Private Placement Project, although I have assigned my rights to those funds
17 to Mr. So for these recovery efforts. Ms. Lu has masqueraded as an owner of a
18 portion of these funds, including in the course of litigation in the United
19 Kingdom, but her claims in this regard are false.
- 20 4. Lu and Yang are husband and wife, and their last known address is 51 Kimbark
21 Crescent, Markham, L3R 8P5, Ontario, Canada.
- 22 5. Lu and Yang, along with co-conspirator and Canadian citizen Keith Millar
23 ("Millar"), acted in concert with many other individuals in the conspiracy to
24 defraud us.
- 25 6. In 2004, I was introduced to Lu and Yang, a Chinese couple living in Toronto,
26 Canada. Yang told me that he was involved in structuring for profit investments

1 that also benefited humanitarian causes and that he was affiliated with the
2 United Nations and the World Bank who oversaw these investments.

3 7. Yang and Lu introduced Mr. So and me to a series of potential investment
4 opportunities during the fall of 2004, all of which allegedly had charitable and
5 humanitarian purposes and goals.

6 8. Millar was the primary point of contact between Ms. Lu and the co-conspirators
7 named in this case. Millar corresponded with Ms. Lu on behalf of KM
8 Associates International LLC which company is I later discovered was co-
9 owned by Mr Kevin Kondas, Ms. Mira Meltzer and Mr. Robert Minton.

10 9. Mr. So and I first learned that the funds deposited in the Private Placement
11 Project were potentially stolen in or around March or April of 2006.

12 10. On or around June 23, 2006, Ms. Lucy Yan Lu forwarded to me a series of
13 emails which contained a set of emails from Keith Millar to Lucy Lu dated
14 February 11, 2005, February 15, 2005 February 17, 2005, February 18, 2005,
15 February 19, 2005, February 20, 2005, March 18, 2005, April 1, 2005, April 2,
16 2005, April 5, 2005. True accurate copies of these e-mails are attached as
17 Exhibits 6, 10-14, and 35 to the Opposition.

18 I declare, under penalty of perjury of the laws of the United States, that the
19 foregoing is true and correct.

20 Executed this 1st day of June, 2010, in Scarborough, Canada.

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23 Birui Wang
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